



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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October 4, 1984

Mr. John LaVillette, Plant Industrial Engineer  
Earle M. Jorgensen Company, Steel Forge Division  
8531 E. Marginal Way South  
P.O. Box 24026  
Seattle, Washington 98124

Dismantlement and Removal of Old Baghouse  
System at the Earle M. Jorgensen Company  
Facility (WAD000602813) in Seattle, Washington

Dear Mr. LaVillette:

This letter is in response to your letter dated September 7, 1984, which requested approval to dismantle and remove the old baghouse system at the Seattle facility. I apologize for my delayed response.

You may proceed with the proposed project as long as the following requirements are satisfied:

- 1) The baghouse system and appropriate ductwork must be cleaned to ensure removal of as much dust and residue as reasonably possible. A vacuum cleaning process would be sufficient as long as the vacuumed residue is collected and subjected to dangerous waste designation procedures under WAC 173-303-070,
- 2) All residue baghouse dust which contains lead and/or cadmium concentrations in excess of EP Toxicity standards (40 CFR 261.24 and WAC 173-303-090(8)) must be managed as dangerous waste in accordance with WAC 173-303, and
- 3) All equipment (for example, personnel protective clothing and tools) must be either:
  - (a) Cleaned upon completion of the project (by rinsing or vacuuming) to reduce all residual dust concentrations to below EP Toxicity standards (Note: All such rinsate or vacuumed residue must be collected and subjected to dangerous waste designation procedures under WAC 173-303-070), or
  - (b) Managed as dangerous waste in accordance with WAC 173-303.

